

## **Exhibit B**

### **Affidavit of Matt Hughes**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION**

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ANTHONY M. FIDRYCH and PATRICIA	:
ANNE FIDRYCH,	:
Plaintiffs,	
v.	:
MARRIOTT INTERNATIONAL, INC.,	:
Defendant.	

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**AFFIDAVIT OF MATT HUGHES IN SUPPORT OF DISMISSAL**

I, Matt Hughes, an adult individual, swear that the following is true and correct based on my personal knowledge, information, and belief.

1. I am the Senior Director, Franchise & Owner Services, for Marriott Hotels International Ltd., a subsidiary of Marriott International, Inc. (“Marriott”). I have offices at 86 Fetter Lane, London, England.

2. In this capacity, I serve as an account manager for certain international franchise management companies and their hotels, and am the primary point-of-contact within the Marriott system for those companies. I currently support approximately sixty (60) international franchise companies, representing one hundred (100) franchise hotels.

3. I have reviewed the Complaint in *Anthony M. Fidrych and Patricia Anne Fidrych v. Marriott International, Inc.*, Civil Action No.: 2:17-cv-2195-PMD, concerning an incident that occurred on December 17, 2015 at the Boscolo Milano hotel located at Corso Matteotti 4/5, Milan, Italy (the “Franchise Hotel”).

4. The ownership, control, and management of the Franchise Hotel is governed by a Franchise Agreement, dated July 15, 2011, by and between Global Hospitality Licensing S.à r.l. (the “Franchisor”) and BH 5 S.p.A. (the “Franchisee”).

5. Marriott is not a party to the Franchise Agreement.

6. Marriott does not own, operate, control, or manage the Franchise Hotel or any part thereof.

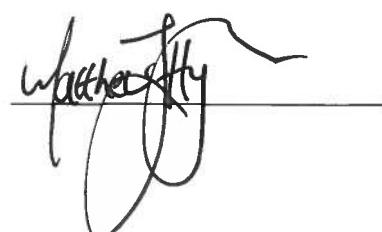
7. Marriott does not hire, employ, compensate, or otherwise direct or control the actions of any of the Franchise Hotel’s employees.

8. Marriott does not have the right to control the day-to-day operations of the Franchise Hotel or its employees in their performance of duties relating to the same.

9. The Franchisee is an independent contractor and no partnership exists between Marriott and the Franchisee. The Franchisee is not an agent, legal representative, or employee of Marriott. The Franchisee is separate and apart from, and independent of, Marriott.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: December 13, 2017  
London, England

A handwritten signature in black ink, appearing to read "Christopher Whetham". It is written in a cursive style with some loops and variations in letter height.